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PLEASE REPLY TO  
Saugerties Office

Earl S. Jones, Jr. (1924-2004)

May 30, 2008

Gonzalez v. Silver, M.D., et al.

**1:07-cv-02898-CM-MHD**

Our File No. 125.25442

Honorable Michael H. Dolinger  
U.S. Magistrate  
Southern District Court  
United States Courthouse  
500 Pearl Street, Room 1670  
New York, New York 10007-1312

Dear Judge Dolinger:

As you know, discovery must be completed, in the above entitled matter, by June 30, 2008 pursuant to the scheduling order herein. As you are also aware, several defendants have recently appeared in the case and one of my clients, Dr. Samuel Lamb, has not yet been served. Plaintiff's examination before trial is scheduled for June 20, 2008 at Sing Sing Correctional Facility. The scheduling order also provides that expert disclosure must be served by July 14, 2008 and dispositive motions must be served no later than August 15, 2008.

In light of the foregoing, I am respectfully requesting that the deadlines for discovery, expert disclosure and dispositive motions all be extended by three (3) months to allow us sufficient time to obtain experts, complete paper discovery, obtain the plaintiff's complete medical file, and prepare dispositive motions after all the defendants have been served and the plaintiff's deposition has been completed. If this meets your approval, please order same by signing where indicated below at your earliest convenience.

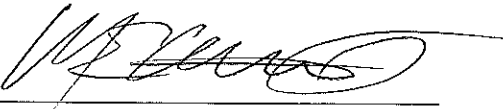
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Gonzalez v. Silver, M.D., et al.  
**1:07-cv-02898-CM-MHD**

May 30, 2008  
Page 2

If you have any questions or require any additional information, please do not hesitate to contact me.  
Thank you for your courtesy and consideration in this matter.

Respectfully yours,

**MAYNARD, O'CONNOR, SMITH & CATALINOTTO, LLP**

By   
Michael E. Catalinotto, Jr.  
*catalinottojr@moscllp.com*  
Bar Roll # MC2315

MCJ:mrp/349927.1

cc: Sabrina Jiggetts, Esq., AAG (via electronic case filing)  
John J. Corgan, Esq. (via fax 914-946-2327 & regular mail)  
Peter R. Taglia, Esq. (via fax 212-227-6050 & regular mail)  
Wilfredo Gonzalez, # 83-A-5986 (via regular mail)

SO ORDERED:

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Hon. Michael H. Dolinger

Dated: June , 2008.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WILFREDO GONZALEZ,

Plaintiff,

**CERTIFICATE OF  
SERVICE**

-against-

DR. LESTER N. WRIGHT, STEVEN SILVER, MD,  
SAMUEL LAM, MD, MICHELLE PUTNAM, MD,  
JONATHAN SMITH, MD, AUGUSTINE  
MOSCATELLO, MD, WLADYSLAW SIDOROWICZ, MD,  
S.J. LILLEY, RN/MHSA, HERBERT GOULDING, MD,  
R. BLAIR, RN/MHSA,

1:07-cv-02898-CM-MHD

Defendants.

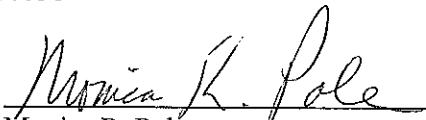
I hereby certify that on May 30, 2008, I have mailed by the United States Postal Service the foregoing proposed letter order to the following non-ECF Participants:

**PERSONAL AND CONFIDENTIAL**


WILFREDO GONZALEZ, 83A 5986  
Woodbourne Correctional Facility,  
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Woodbourne, NY 12788-1000

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White Plains, New York 10604

Peter R. Taglia, Esq.  
Dwyer & Taglia, Esqs.  
111 John Street, Suite 620  
New York, New York 10038

  
Monica R. Pole

Sworn to before me this 30th  
day of May, 2008.

  
NOTARY PUBLIC - STATE OF NEW YORK

**PATRICIA V. STROH**  
Notary Public, State of New York  
No. 01ST4813879  
Qualified in Ulster County  
Commission Expires February 28, 20 11